

W. S. HOWARD, President-Manager

MILLINGTON TELEPHONE COMPANY, INC.

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REGULATORY AUTH.

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OFFICE OF THE
EXECUTIVE SECRETARY

April 21, 1999

David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

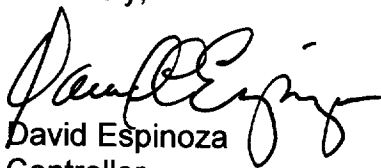
RE: Toll Dialing Parity

99-00278

As outlined in FCC Docket 96-98 (Implementation of the Local Competition Provisions of the Telecommunications Act of 1996) and the Tennessee Regulatory Authority's letter dated April 1, 1999, Millington Telephone Company submits this plan for implementing Intralata Toll Dialing Parity in the Millington Exchanges located in the state of Tennessee.

The original plan and the \$25.00 filing fee are enclosed. The thirteen (13) copies will be sent on April 22, 1999. If you have any questions, please call me at 901/872-5150.

Sincerely,


David Espinoza
Controller

Enclosure

**Intralata Toll
Dialing Parity
Plan**

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**Millington Telephone Company, Inc.
Tennessee**

April 21, 1999

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I. Purpose

As outlined in FCC Docket 96-98 and the TRA's letter dated April 1, 1999, Millington Telephone Company, Inc submits this plan for implementing intraLATA Toll Dialing Parity in the Millington exchanges located in the state of Tennessee. The intent of this Plan is to provide a proposal that, upon implementation, would provide customers the ability to select the telecommunications carrier of their choice for routing their intraLATA toll calls.

II. IntraLATA Environment

Millington Telephone Company, Inc. customers currently dial area code and the seven digits to complete intraLATA toll calls. The schedule date for implementation of toll dialing parity should not change this dialing pattern.

In 1995, toll-free intraLATA countywide calling was initiated for Millington Telephone Company, Inc. via an order from the Tennessee Public Service Commission. Millington Telephone Company, Inc. currently maintains tar code billing tables to identify "free county-wide" intraLATA toll calls originated by Millington Telephone Company, Inc. intraLATA toll customers and to ensure that billing does not occur on these calls. Millington Telephone Company, Inc. will continue to process toll-free intraLATA countywide call in this manner for its intraLATA toll customers after implementation of intraLATA toll dialing.

III. Implementation Schedule

Millington Telephone Company, Inc. will offer dialing for intraLATA toll in all of its Tennessee exchanges on September 1, 1999. This date is requested for several reasons. The request has been presented on a short notice and complying with all aspects of the request cannot be accomplished in such a short time period. Also, Millington Telephone Company, Inc. is in the early stages of up-grading its switch from a NORTEL DMS 100 to a NORTEL DMS 500. The preliminary schedule is for the conversion to be complete by late summer. Attachment A is a specific listing of all exchanges on record for the state of Tennessee where the plan would be implemented.

IV. Carrier Selection Procedures

Millington Telephone Company, Inc. will implement the full 2-PIC (Primary Interexchange Carrier) carrier selection methodology. With the full 2-PIC methodology, customers will be able to presubscribe to one telecommunications carrier for interLATA toll calls and presubscribe to the same or a different participating telecommunications carrier, including their existing local exchange company, for all intraLATA toll calls. Orders for changes will be accepted and processed beginning on the implementation date.

Millington Telephone Company, Inc. employees who communicate with the public, accept customer orders, and serve in customer service capacities will be trained to explain the process to customers for making PIC changes for intraLATA toll calls. Business Office personnel will be prepared to make changes in customer records based upon requests from customers or carriers and direct customers to their chosen intraLATA carriers. Processes will be in place to provide new customers with an opportunity to choose their intraLATA toll carrier from a list of available carriers.

Existing Customers

Currently, BellSouth is the intraLATA toll provider for existing customers in Millington Telephone Company, Inc. local exchange area. On the date in which intraLATA toll presubscription is implemented in Tennessee, customers may presubscribe to any telecommunications carrier offering intraLATA toll service in their exchange. Customers may make this selection through their own initiative or as a result of the promotional marketing activities of participating intraLATA toll telecommunications carriers. Customers may communicate their choice of carriers directly to Millington Telephone Company, Inc., as their local exchange service provider, through the local Business Office or indirectly through their selected carriers.

For a waiver period of 30 days from implementation, customers will not be assessed a PIC change charge for their initial intraLATA toll carrier choice or a interLATA PIC change charge during the same contact with the Business Office.

Millington Telephone Company, Inc. has established a \$35.65 fee for "slamming" or unauthorized PIC changes submitted by carriers for end-user customers.

New Installation Customers

Customers who contact Millington Telephone Company, Inc. requesting new telephone exchange service are currently being provided a list of telecommunications carriers available to provide interLATA toll service. Upon implementation of intraLATA toll presubscription, the customer will be provided a second list of carriers that provide intraLATA toll service in their exchange. The list of intraLATA toll carriers will be presented in a competitively neutral manner. Customers who do not make a positive choice for an intraLATA toll carrier will be identified within Millington Telephone Company, Inc.'s system as a "no-PIC" and will not be automatically defaulted to a carrier. Customers identified as "no-PIC" within Millington Telephone Company, Inc.'s system will be required to dial 10-10-XXX to place intraLATA toll calls until they make an affirmative choice for an intraLATA toll carrier.

V. Customer Education/Notification

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Customers will receive information explaining their opportunity to select an intraLATA carrier a minimum of 30 days in advance of the offering of intraLATA toll dialing parity via a bill message. In addition, during the 30 days following implementation of intraLATA Dialing Parity, customers will receive a bill insert also explaining their opportunity to select an intraLATA carrier. Millington Telephone Company, Inc. anticipates that promotional strategies by carriers will contribute to customer awareness on intraLATA toll dialing parity. Customer telephone directories will be updated as new editions are published to reflect the opportunity for customer to choose an intraLATA toll carrier.

VI. Carrier Notification

Current interexchange carriers will be notified of Millington Telephone Company, Inc. intraLATA toll dialing parity implementation via letter approximately 90 days in advance of the proposed implementation date. Carriers should provide a list of exchanges in which they plan to offer intraLATA toll service at least 60 days in advance of Millington Telephone Company, Inc.'s implementation date. Millington Telephone Company, Inc. needs notification in advance to include the carrier on the list of participating carriers in each Millington Telephone Company, Inc. exchange. Certified carriers who enter the market after implementation will be added to the list of participating carriers within 30 days of notifying Millington Telephone Company, Inc..

Millington Telephone Company, Inc. will provide subscriber listing information to carriers in "readily accessible" tape or electronic formats in a timely manner as requested through the processes that currently exist for the interLATA market. The process includes subscriber listing updates to carriers for new customers who choose that carrier or for existing customers of a carrier who revise their subscriber listings information. In addition, carriers can obtain complete subscriber listings in several formats. The provision of this information is in compliance with FCC Order No. 96-333, Paragraph 389.

Millington Telephone Company, Inc. will comply with Part 51, Section 305, 307, 325, 327, 329, 331, 333 and 335 of the FCC Order in providing the required information and notice to the public of network changes. Millington Telephone Company, Inc. plans to file a public notice with the FCC, with possible migration of the notice to the Internet process as described in Section 329. The notice will include network information as outlines in Section 327. The notice will be provided within the timeframes described in Sections 331-333.

VII. Access to Operator Services and Directory Assistance

Access to Operator Services and Directory Assistance will continue to be available through the customer's local exchange carrier or interLATA carrier. No

industry standard has been established for access to Operator Services and Directory Assistance unique to the intraLATA carrier. The customers dial "0" or "1-411" to reach their local Directory Assistance. The customer dials "00" to reach their interLATA operator and dials "1-NPA-555-1212" for accessing their interLATA carrier's Directory Assistance.

VIII. Cost Recovery

The necessary cost information has not been calculated at the time of this filing. A supplemental filing will be made when this information is known. Below is the anticipated information to be used to arrive at the charges.

As stated in section 51.215 of FCC Order 96-33, CC Docket No. 96-98, "a LEC may recover the incremental costs necessary for the implementation of toll dialing parity. The LEC must recover such costs from all providers of telephone exchange service and telephone toll service in the area served by the LEC, including that LEC."

The incremental costs associated with implementing toll dialing parity by Millington Telephone Company, Inc. include:

- 1) Software translations.
- 2) System programming/testing.
- 3) Training for Business Office, Marketing, Carrier Services, Customer Services, and Service Center personnel.
- 4) Customer notification (bill message and bill insert).
- 5) Implementation activity.
- 6) PIC Change Charge Waiver

For items 1-7 above, Millington Telephone Company, Inc. proposes to recoup the incremental cost of implementing intraLATA toll dialing parity over a period of 4 years beginning on the date of implementation. For items 1-7 above, a cost recovery per minute rate of **\$0.000XXX** will be developed based on the identified cost divided by the total of all carrier's originating intraLATA minutes of use. Attachment B contains the total cost estimate based on the incremental costs identified above and the rate based on a recovery period of 4 years. The detailed cost study supporting this data is proprietary and provided under separate cover. The incremental cost of the PIC Change Fee Waiver (item 8 above) will be calculated in December 1999 as follows:

- 1) Number of PIC Change Fees Waived during the waiver period
- 2) Multiplied by the cost of a PIC Change as reflected in the cost study information accompanying Millington Telephone Company, Inc.'s Tariff Filing to establish a PIC Change Charge.
- 3) Divided by the minutes of use forecasted for the remaining three and one half years of the recovery period (using the same forecast as Attachment B).

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VIII. Cost Recovery

The necessary cost information has not been calculated at the time of this filing. A supplemental filing will be made when this information is known. Below is the anticipated cost elements to be used to arrive at the charges.

As stated in section 51.215 of FCC Order 96-33, CC Docket No. 96-98, "a LEC may recover the incremental costs necessary for the implementation of toll dialing parity. The LEC must recover such costs from all providers of telephone exchange service and telephone toll service in the area served by the LEC, including that LEC."

The incremental costs associated with implementing toll dialing parity by Millington Telephone Company, Inc. include:

- 1) Software translations.
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- 4) Customer notification (bill message and bill insert).
- 5) Implementation activity.
- 6) PIC Change Charge Waiver

For items 1-6 above, Millington Telephone Company, Inc. proposes to recoup the incremental cost of implementing intraLATA toll dialing parity over a period of 4 years beginning on the date of implementation. For items 1-6 above, a cost recovery per minute rate of **\$0.000XXX** will be developed based on the identified cost divided by the total of all carrier's originating intraLATA minutes of use. Attachment B contains the total cost estimate based on the incremental costs identified above and the rate based on a recovery period of 4 years. The detailed cost study supporting this data is proprietary and provided under separate cover. The incremental cost of the PIC Change Fee Waiver (item 6 above) will be calculated in December 1999 as follows:

- 1) Number of PIC Change Fees Waived during the waiver period
- 2) Multiplied by the cost of a PIC Change as reflected in the cost study information accompanying Millington Telephone Company, Inc.'s Tariff Filing to establish a PIC Change Charge.
- 3) Divided by the minutes of use forecasted for the remaining three and one half years of the recovery period (using the same forecast as Attachment B).

The result will be an amount to be added to the IntraLATA Carrier Common Line Rate beginning on January 21, 2000 for the remaining three and one half years of the recovery period in addition to the established rate of **\$0.000XXX**.

To minimize billing costs, Millington Telephone Company, Inc. proposes to bill this cost recovery per minute rate as an additional element to the IntraLATA Carrier Common Line originating minutes rate element. The components of the Carrier Common Line rate element will be identified separately in the tariff.

Millington Telephone Company, Inc. will file for approval with the TRA, an Equal Access Impact Recovery Plan that will be developed and implemented in coordination with intraLATA Presubscription.

Rights Under Section 251(f)(2) of the Telecommunications Act of 1996

The filing of this plan does not preclude Millington Telephone Company, Inc. from exercising any of its rights to Suspension or Modification under Section 251 (f)(2) of The Telecommunications Act of 1996.

Attachment A
Millington Telephone Co Inc
IntraLATA Toll Dialing Parity

Exchanges
Drummonds
Mason
Millington
Munford
Rosemark
Shelby Forest
Stanton

Attachment B

Millington Telephone Co Inc
IntraLATA Toll Dialing Parity

Cost Recovery

Note: Information supporting the calculation of the per minute addition is considered Proprietary Information by Millington Telephone Co Inc and has been marked as such and forwarded under separate cover.

<u>Total Cost Based On Incremental Items</u>	<u>Total Intralata Minutes (4 yrs)</u>	<u>Time Period</u>	<u>Per Minute Addition to Carrier Common Line</u>
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